## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

RALPH S. JANVEY, in his capacity as	§	
Court-appointed receiver for the Stanford	§	
Receivership Estate	§	
Plaintiff,	§	
v.	§	
GREENBERG TRAURIG, LLP; and	§	
GREENBERG TRAURIG, PA,	§	CIVIL ACTION NO. 3:12-cv-04641-N
oneer perconditions, in,	§	
Defendants.	§	
	§	
	§	

#### DEFENDANT GREENBERG TRAURIG'S MOTION FOR SUMMARY JUDGMENT

Pursuant to Rule 56, Fed. R. Civ. P., and Local Rule 56(a), Greenberg Traurig, LLP and Greenberg Traurig, PA (collectively, "Greenberg") respectfully submit this motion for summary judgment as to the remaining claims brought by plaintiff Ralph S. Janvey (the "Receiver"), in his capacity as the Court-Appointed Receiver for the Stanford Receivership Estate.

The grounds for this motion are set forth fully in the accompanying "Greenberg Traurig's Brief in Support of Motion for Summary Judgment" ("Greenberg Brief") and supported by record citations included in the Appendix filed contemporaneously herewith, in accordance with Local Rule 7.1 Pursuant to Local Rule 56.5(b), the precise claims and elements of each claim as to which summary judgment is sought are set forth in Greenberg's Brief.

Respectfully submitted,

# FOGLER, BRAR, FORD, O'NEILL & GRAY LLP

Murray Fogler mfogler@fbfog.com Michelle E. Gray mgray@fbfog.com Robin O'Neil roneil@fbfog.com 909 Fannin, Suite 1640 Houston, Texas 77010 Telephone: (713) 481-1010 Facsimile: (713) 574-322

### COWLES & THOMPSON, P.C.

Jim E. Cowles jcowles@cowlesthompson.com Sim Israeloff sisraeloff@cowlesthompson.com Charles A. Green cgreen@cowlesthompson.com 901 Main Street, Suite 3900 Dallas, Texas 75202

Telephone: (214) 672-2000 Facsimile: (214) 672-2347

#### **BOIES SCHILLER FLEXNER LLP**

By: /s/ Stuart H. Singer

Stuart H. Singer ssinger@bsfllp.com Sashi C. Bach sbach@bsfllp.com Pascual A. Oliu poliu@bsfllp.com

401 East Las Olas Boulevard, Suite 1200

Fort Lauderdale, Florida 33301 Telephone: (954) 356-0011 Facsimile: (954) 356-0022

# **CERTIFICATE OF SERVICE**

The undersigned certifies that on the 22<sup>nd</sup> day of July, 2019, a true and correct copy of the foregoing document was delivered via electronic means pursuant to FED. R. CIV. P. 5(b)(2)(D) and Local Rule 5.1, to all counsel of record.

/s/ Sashi C. Bach Sashi C. Bach, Esq.